



State of Utah

Department of
Environmental Quality

Dianne R. Nielson, Ph.D.
Executive Director

DIVISION OF AIR QUALITY
Richard W. Sprott
Director

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

DAQ-044-2005

MEMORANDUM

Subject: Kennecott Utah Copper Corporation Copperton Concentrator AO

Date: June 14, 2005

From: Nando Meli

Through: Rusty Ruby

To: Kennecott Copperton file 10571-017

A Public comment period was held from May 8, 2005 to June 7, 2005 for the proposed modification of the pebble crushing process in Kennecott Utah Copper Corporation's (KUCC) Approval Order (AO) DAQE-862-01 dated November 20, 2001, for the Copperton Concentrator site. We received two sets of comments, one from a private citizen and one from KUCC.

Written Comments

The first comment:

The previous AO, DAQE-862-01, dated November 20, 2001 contained stack testing requirements for the Product Molybdenite Dryers. This requirement is absent from the current ITA. This change should be noted in the Abstract and explained in the engineering review.

DAQ Response

The PM₁₀ SIP limited the Product Molybdenite Dryers to 0.15 lbs/hr and required them to be tested if directed. After the Title V program was started some of the stack testing requirements were changed from test if directed to test every five years or the stack testing requirement was removed. If KUCC operated one of the dryers 8760 hrs/yr, the emissions would be 0.67 tpy. Based on these facts, the stack testing requirement was removed.

The sentence, The stack testing requirements for this equipment and for the Product Molybdenite Dryers have been removed, has been added to the AO abstract.

Abstract

*KUCC requested approval to add two pebble-crushing units and related material handling equipment. This would allow KUCC to increase the throughput of copper ore through the concentrator and improve process efficiency. KUCC has stopped operation of the Feed Molybdenite Dryers and Molybdenite Rotary Kiln and KUCC requested that they be removed from the AO. **The stack testing requirements for this equipment and for the Product Molybdenite Dryers have been removed.** KUCC also requested approval to replace of one of its product molybdenite dryers and associated heater with a larger product molybdenite dryer that will use the existing product molybdenite dryer scrubber and one of the existing feed molybdenite dryer heaters to supply hot oil to the new product molybdenite dryer. One set of written comments was received during the comment period.*

The first KUCC comment:

Condition 5.B states that all other records shall be kept for a minimum period of five years.

KUCC requested that it be kept at two years.

DAQ Response

All Title V sources are required to keep their records for a minimum period of five years. So the condition remains with the five year requirement.

The second KUCC comment:

Condition 11.C states that the pebble crusher is subject to NSPS and that the opacity limit is 7%.

KUCC requested that it be changed to 10%.

DAQ Response

The New Source Performance Standards (NSPS) Subpart LL, (Standards of Performance for Metallic Mineral Processing Plants) applies to the crusher. Subpart LL requires a 7% opacity limit for crushers. Therefore, the correct opacity limit is 7%.